



COUNTY OF GOOCHLAND

OFFICE OF THE COUNTY ATTORNEY

Goochland County Administration Building
1800 Sandy Hook Road, Suite 310
P. O. Box 10, Goochland, Virginia 23063
(804) 556-5877 (804) 556-4369 Fax (804) 556-5317 TDD

Andrew R. McRoberts
County Attorney

March 16, 2009

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: RM-11514, Petition for a Rulemaking to Revise and Update the Travelers Information Service Rules of Highway Information Systems, Inc. (filed July 16, 2008)

COMMENTS OF GOOCHLAND COUNTY, VIRGINIA

I write today on behalf of Goochland County, Virginia to express our comments regarding the Petition for a Rulemaking to Revise and Update the Travelers Information Service Rules of Highway Information Systems, Inc, filed by Highway Information Systems, Inc. (HIS) on July 16, 2008.¹ Goochland County strongly supports the HIS Petition.

HIS's Petition requests that the Federal Communications Commission ("Commission") amend certain of its Travelers Information Service rules. Specifically, HIS is requesting that the Commission re-title 47 C.F.R. § 90.242 as "Local Government Radio Service"²; amend references in § 90.242 from "Travelers' Information Stations" to "Local Government Radio Stations"³; and amend § 90.242(A)(7) to provide that "[l]ocal government radio stations shall only transmit noncommercial information as determined by the government entity licensed to operate the station and other government entities with which the licensee cooperates, including messages relating to Department of Homeland Security initiatives such as Citizen Corps and Ready.gov."⁴

Goochland County believes it is in the best interests of the public to have an amendment of 47 C.F.R. § 90.242 to make it clear that licensed information radio station operators may broadcast any public safety message at any time that is deemed to further the protection of life

¹ Petition for a Rulemaking to Revise and Update the Travelers Information Service Rules of Highway Information Systems, Inc. (filed July 16, 2008) (HIS Petition).

² HIS Petition at Attachment A.

³ Id.

⁴ Id..


and property. Travelers' Information Systems (TIS) enable the public to receive critical information free of charge, allowing important messages to reach a greater percentage of the public. TIS are essential to allow the public access to information concerning road conditions, traffic hazards, travel advisories, Amber Alerts, 911 outage notices, natural disasters, public health warnings, terrorist threat levels, weather conditions and other civil defense notices. Access to TIS for public safety messages would positively affect the quality of life for the general public who live in or visit Goochland County.

"[T]he Commission can best serve the interests of TIS licensees by minimizing the editorial restrictions on the content of TIS broadcasts and allowing federal, State, and local TIS station licensees to exercise their own good faith judgment regarding the content of TIS station broadcasts."⁵

In addition, HIS is requesting, "that the Commission eliminate the limitation on the sites for local government radio stations that confines such stations to areas near roads, highways and public transportation terminals."⁶ The County agrees with HIS that "the determination of site locations should be left to the government licensee, provided that the interference criteria are met with respect to commercial AM radio station."⁷

Therefore, Goochland County respectfully requests the Commission approve HIS's Petition.

Respectfully submitted,



Andrew R. McRoberts
County Attorney

ARM/agb

cc: Bill Cleveland, Director of Information Systems
Ken Brown, Chief, Goochland Co. Fire-Rescue Department
Paul Drumwright, Assistant to the County Administrator

⁵ Id at 6.

⁶ Id at 10

⁷ Id.